



Federal Communications Commission
Washington, D.C. 20554

July 24, 2018

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Misuse of Internet Protocol (IP) Captioned Telephone Service; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*,
CG Docket Nos. 13-24 and 03-123

Dear Ms. Dortch:

In the further notice of proposed rulemaking on Internet Protocol Captioned Telephone Service (IP CTS) released June 9, 2018, there are references to certain data provided to the Consumer and Governmental Affairs Bureau (CGB) by Rolka Loube, LLC (Rolka Loube), the TRS Fund administrator, on January 24, 2018, and January 29, 2018.¹ By this letter, CGB places the referenced data in the record of the proceeding.

Attachment A, the document provided to CGB on January 24, 2018, and cited in footnote 350 of the *FNPRM*, reports (1) the number of new IP CTS devices identified in CDRs in each month of 2017 and (2) the average number of such new devices per month of 2017.² Attachment B, provided to CGB on January 29, 2018, and cited in footnote 372 of the *FNPRM*, shows, for each of the last seven months of 2015: (1) the number of new ESNs reported in CDRs in that month; (2) the number of minutes reported for the new ESNs in each of the 24 subsequent months; (3) the average monthly minutes for the new ESNs in the first and second full years of service; and (4) the ratio of the average minutes in the second year to average minutes in the first year.

Respectfully Submitted,

Eliot Greenwald
Deputy Division Chief, Disability Rights Office
Consumer and Governmental Affairs Bureau

¹ *Misuse of Internet Protocol (IP) Captioned Telephone Service; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry, FCC 18-79, paras. 125 n.350, 138 n. 372 (June 8, 2018) (*FNPRM*).

² New devices are identified as devices for which the Electronic Serial Number was not included in any CDR submitted in the previous six months.

ATTACHMENT A

New IP CTS Devices in 2017

Year	Month	New ESN Count
2017	Jan	5,382
2017	Feb	5,242
2017	Mar	6,485
2017	Apr	5,800
2017	May	6,532
2017	Jun	6,359
2017	Jul	5,885
2017	Aug	6,442
2017	Sep	5,633
2017	Oct	6,510
2017	Nov	6,229
2017	Dec	6,186
2017	<i>Total</i>	<i>72,685</i>

Average New ESNs/month **6,057.1**

ATTACHMENT B

IP CTS - New ESNs - Monthly Minutes in First Two Years of Service

Month of Registration	1506	1507	1508	1509	1510	1511	1512	
New ESNs	1,966	2,027	2,187	2,295	3,139	2,495	2,185	
1507 Minutes	296,322							
1508 Minutes	276,633	357,431						
1509 Minutes	257,110	322,106	381,476					
1510 Minutes	257,729	313,578	338,140	403,616				
1511 Minutes	248,632	273,186	305,799	356,619	483,905			
1512 Minutes	251,022	290,832	297,999	347,935	451,055	374,844		
1601 Minutes	240,008	274,938	290,385	307,263	418,698	335,781	397,856	
1602 Minutes	210,328	247,851	263,939	267,452	378,402	297,134	326,919	
1603 Minutes	211,165	265,344	281,082	281,688	387,235	289,854	329,959	
1604 Minutes	192,095	238,460	251,596	259,804	358,792	253,343	288,815	
1605 Minutes	201,761	245,892	255,619	259,353	346,037	247,360	286,864	
1606 Minutes	190,938	226,042	235,890	238,799	326,694	236,694	266,240	
1607 Minutes	181,376	209,688	228,820	227,235	320,327	223,615	248,740	
1608 Minutes	192,811	218,223	242,404	233,321	329,244	232,947	247,747	
1609 Minutes	173,029	195,244	217,588	217,770	304,379	212,426	235,162	
1610 Minutes	175,681	200,135	220,085	218,382	304,929	213,842	235,644	
1611 Minutes	165,936	191,233	209,217	218,484	290,669	212,560	230,626	
1612 Minutes	174,456	198,800	205,352	218,683	295,352	216,309	241,204	
1701 Minutes	171,532	184,256	197,278	212,906	276,906	201,803	229,255	
1702 Minutes	144,849	159,027	169,319	183,084	240,759	168,501	197,006	
1703 Minutes	158,900	179,436	192,199	195,535	272,614	186,911	214,297	
1704 Minutes	138,886	159,081	171,949	179,777	243,907	166,598	190,689	
1705 Minutes	139,307	164,984	170,321	183,410	253,298	160,974	194,859	
1706 Minutes	129,171	147,653	159,995	168,179	227,564	147,088	173,385	
1707 Minutes		143,692	152,530	162,459	228,514	147,703	162,790	
1708 Minutes			155,261	163,490	227,295	145,055	170,041	
1709 Minutes				153,163	208,593	134,086	161,958	
1710 Minutes					223,167	141,680	169,205	
1711 Minutes						135,997	162,502	
1712 Minutes							167,647	
Total 1st year Minutes*	2,833,743	3,265,348	3,373,148	3,400,853	4,409,695	3,130,399	3,335,777	
1st Year Minutes per ESN	1,441	1,611	1,542	1,482	1,405	1,255	1,527	
Total 2nd year Minutes	1,945,932	2,141,763	2,221,094	2,257,553	2,988,639	1,952,705	2,193,634	
2nd Year Minutes per ESN	990	1,057	1,016	984	952	783	1,004	
Ratio of 2nd Year Minutes to 1st Year Minutes	0.69	0.66	0.66	0.66	0.68	0.62	0.66	Avg. Ratio = 0.66

*First year minutes exclude minutes for the month of registration.